

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>JEFFREY LYNN GOSS,</b>	:	
<b>Debtor</b>	:	<b>CASE NO. 4:18-bk-04257</b>
	:	
<b>JEFFREY LYNN GOSS</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>JP MORGAN CHASE BANK,</b>	:	
<b>NATIONAL ASSOCIATION,</b>	:	
<b>Respondent</b>	:	

1. Denied that JPMorgan Chase is entitled to relief.
2. Proof that the Debtor is required to make payments is demanded at trial and this averment is therefore denied. The Centre County litigation that is currently stayed seeks a determination of whether the Debtor must pay JPMorgan Chase or not and that is why the Debtor seeks to have the litigation proceed.
3. Proof of default is demanded at trial and this averment is therefore denied. The total amount referenced in 3.g, does not total \$56,111.24, but rather \$6,111.24 and this averment is therefore denied.
4. Admitted that the Debtor's estimate of value of the property is \$695,200.00. Proof of the amount allegedly owed to Movant is demanded at trial and this averment is therefore denied.
5. Proof that JPMorgan's interests are being immediately and irreparable harmed is demanded at trial and this averment is therefore denied. As JPMorgan concedes, it is more than adequately protected by an equity cushion of over \$500,000.
6. Admitted.

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Respectfully submitted,

/s/ Dorothy L. Mott

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Dorothy L. Mott, Esquire  
PA ID: 43568  
Dorothy L. Mott Law Office, LLC  
125 State Street  
Harrisburg, PA 17101  
717.232.6650 Tel  
717.232.0477 Fax  
doriemott@aol.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>Debtor</b>	:	<b>CASE NO. 4:18-bk-04257</b>
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<b>JP MORGAN CHASE BANK,</b>	:	
<b>NATIONAL ASSOCIATION,</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on July 30, 2019, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
Anne K Fiorenza, Esquire, Assistant UST <a href="mailto:anne.fiorenza@usdoj.gov">anne.fiorenza@usdoj.gov</a>	Electronically
CHARLES J DEHART, III ESQUIRE <a href="mailto:dehartstaff@pamd13trustee.com">dehartstaff@pamd13trustee.com</a>	Electronically
KEVIN FRANKEL, ESQ MICHELE ZERR, ESQ ATTORNEYS FOR JP MORGAN CHASE BANK NATIONAL ASSOCIATION <a href="mailto:kfrankel@logs.com">kfrankel@logs.com</a> <a href="mailto:MZerr@ReedSmith.com">MZerr@ReedSmith.com</a>	Electronically

I certify under penalty of perjury that the foregoing is true and correct.

/s/Dorothy L Mott

\_\_\_\_\_  
Dorothy L Mott, Esquire  
Atty ID #43568  
Dorothy L. Mott Law Office, LLC  
125 State Street

Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
doriemott@aol.com